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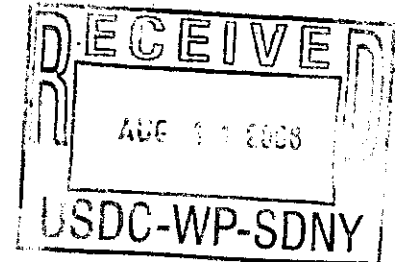
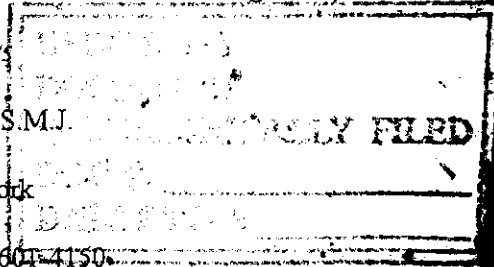
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MEMO ENDORSED

August 11, 2008

VIA FACSIMILE (914) 390-4095

Hon. George A. Yanthis, U.S.M.J.  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4150



Re: **PROPOSED BRIEFING SCHEDULE**  
**Buckley v. Philips Electronics North America Corp., et al**  
**USDC:SDNY Case No. 07 Civ. 6775 (SCR)(GAY)**

Dear Judge Yanthis:

Please be advised that my firm represents the defendants in the above-entitled action. In compliance with Your Honor's Order of July 31, 2008, counsel for the parties have conferred and hereby propose the following briefing schedule for the defendant-pension plan's Rule 12(b)(6) motion and the defendant's attorney disqualification motion (collectively, the "motions"):

1. Tuesday, August 26, 2008: defendants will serve their respective motion papers for both the Rule 12(b)(6) and the attorney disqualification motions.
2. Tuesday, September 16, 2008: plaintiff will serve his answering papers to both motions and serve a cross-motion to amend the Amended Complaint, if so desired.
3. Tuesday, September 23, 2008: defendants to serve their reply papers in support of the motions, and their answering papers to plaintiff's cross-motion, if necessary.

Thank you for Your Honor's consideration of the requested briefing schedule. I have faxed a copy of this letter to plaintiff's counsel.

Very truly yours,

Bleakley Platt & Schmidt, LLP

Joseph DeGiuseppe, Jr.

JD/crf

cc: Christopher A. D'Angelo, Esq. (212-763-6810)

SO ORDERED:

*George A. Yanthis*  
Hon. George A. Yanthis  
United States Magistrate Judge.

8/18/08